

KEEFE BARTELS & CLARK LLC

John E. Keefe, Jr.
830 Broad Street
Shrewsbury, NJ 07702
Telephone: (732) 224-9400
Facsimile: (732) 224-9494
Email: jkeefe@keefebartels.com

**ZWERLING, SCHACHTER &
ZWERLING, LLP**

Richard A. Speirs
Kevin M. McGee
41 Madison Avenue
New York, NY 10010
Telephone: (212) 223-3900
Facsimile: (212) 371-5969
Email: rspeirs@zsz.com
kmcgee@zsz.com

Attorneys for Movants Esperanza Reynolds and Reza Zarr

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY**

IN RE VIRGIN MOBILE USA IPO
LITIGATION

This Document Relates To:

ALL ACTIONS

)
) Lead Case No. 2:07-CV-5619 (SDW)
) (MCA)
)
) (Securities Class Action)
)
) District Judge Susan D. Wigenton
)
) Magistrate Judge Madeline C. Arleo
)
) Motion Date: February 19, 2008
)
) ORAL ARGUMENT REQUESTED

**NOTICE OF MOTION OF ESPERANZA REYNOLDS
AND REZA ZARR FOR APPOINTMENT OF LEAD
PLAINTIFFS, LEAD COUNSEL AND LIAISON COUNSEL**

PLEASE TAKE NOTICE that pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”), Esperanza Reynolds and Reza Zarr (collectively, “Movants”) will move this Court, at a time and place to be determined, for an Order:

(1) appointing Movants as Lead Plaintiffs in the above action pursuant to Section 21(D)(a)(3)(B) of the PSLRA; and

(2) approving Movants’ selection of Zwerling, Schachter & Zwerling, LLP as Lead Counsel and Keefe Bartels & Clark LLC as Liaison Counsel.

This motion is supported by the accompanying memorandum of law in support of the motion, the [proposed] order granting the motion, the affidavit of Richard A. Speirs in support of the motion and the exhibits attached thereto, all of the prior pleadings and proceedings had herein, and such other written and/or oral argument as may be presented to the Court.

Dated: January 22, 2008

Respectfully submitted,

By: s/ John E. Keefe, Jr.
KEEFE BARTELS & CLARK LLC
John E. Keefe, Jr.
830 Broad Street
Shrewsbury, NJ 07702
Telephone: (732) 224-9400
Facsimile: (732) 224-9494
Email: jkeefe@keefebartels.com